

REMARKS

Applicants appreciate the Examiner's thorough examination of the present application as evidenced by the Office Action of November 12, 2003 (hereinafter "Office Action"). Applicants especially appreciate the indication that Claims 8, 9, 11 - 13, 21, 33, 34, 46, 55, 56, 58 - 60, and 68 recite patentable subject matter. Rather than writing various ones of the foregoing claims in independent form at this time, Applicants have amended independent Claims 1, 10, 23, 26, 35, 48, and 57 to incorporate recitations from dependent Claims 2, 15, 24, 27, 40, 49, 62, respectively, which have been canceled without prejudice or disclaimer. Applicants respectfully submit that the cited reference does not disclose or suggest at least automatically ranking a plurality of job post sites by accessing a fact table that contains data relevant to at least one job post site selection criterion and using an inference engine to process the at least one job post selection criterion and the fact table to rank the plurality of job post sites based on the at least one job post site selection criterion. In addition, Applicants have amended the Specification to make reference to block 144 in FIG. 8 and have amended the Abstract to reduce the word count. Accordingly, Applicants submit that all pending claims are in condition for allowance. Favorable reconsideration of all pending claims is respectfully requested for at least the reasons discussed hereafter.

Independent Claims 1, 10, 23, 26, 35, 48, and 57 are Patentable

Independent Claim 1 stands rejected under 35 U.S.C. §102(a) as being anticipated by the document entitled "Webhire Links Corporate Recruiting Desktops to Over 2,000 Job Posting Sites," March 2, 2000 (hereinafter "Webhire").

Independent Claim 1 is directed to a method of selecting a job post site and has been amended to incorporate the recitations of Claim 2. Claim 1, as amended, recites:

- obtaining at least one job post site selection criterion;
- automatically ranking a plurality of job post sites based on the at least one job post site selection criterion, comprising:
 - accessing a fact table that contains data relevant to the at least one job post site selection criterion; and
 - using an inference engine to process the at least one job post site selection criterion and the fact table to rank the plurality of job post sites based on the at least one job post site selection criterion; and
 - selecting the job post site from the plurality of job post sites based on

the ranking of the plurality of job post sites.

Claims 10, 23, 26, 35, 48, and 57 include similar recitations. Thus, according to the recitations of the pending independent claims, a plurality of job post sites are automatically ranked based on at least one job post site selection criterion by accessing a fact table that contains data relevant to the at least one job post site selection criterion and by using an inference engine to process the at least one job post site selection criterion and the fact table to rank the plurality of job post sites based on the at least one job post site selection criterion. Applicants note that an "inference engine" is a term of art and is defined in the Microsoft Press Computer Dictionary, Third Edition, as "[t]he processing portion of an expert system. It matches input propositions with facts and rules contained in a knowledge base and then derives a conclusion, on which the expert system then acts." An expert system is described, for example, on page 11, lines 5 - 24 of the Specification.

The Office Action states that paragraph 4 of the Webhire document inherently discloses the "accessing a fact table" and "using an inference engine" recitations of Claim 2, which have now been incorporated into Claim 1. Applicants respectfully submit that the allegation that the recitations of Claim 2 are inherently disclosed in the Webhire document is an oversimplification of Applicants' claim language. As discussed above, Applicants are claiming "accessing a fact table" and using "an inference engine," which are characteristic of an expert system, not simply using a computer to access a database. Applicants submit that the Webhire reference contains no disclosure or suggestion of using expert system technology in which a fact table is accessed and an inference engine is used as recited in Claims 1, 10, 23, 26, 35, 48, and 57, as amended.

Accordingly, for at least the foregoing reasons, Applicants respectfully submit that independent Claims 1, 10, 23, 26, 35, 48, and 57 are patentable over Webhire and that Claims 3 - 9, 11 - 14, 16 - 22, 25, 28 - 34, 36 - 39, 41 - 47, 50 - 56, 58 - 61, 63 - 69 are patentable at least per the patentability of independent Claims 1, 10, 23, 26, 35, 48, and 57.

CONCLUSION

In light of the above amendments and remarks, Applicants respectfully submit that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application, as amended, is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

It is not believed that an extension of time and/or additional fee(s)-including fees for net addition of claims-are required, beyond those that may otherwise be provided for in documents accompanying this paper. In the event, however, that an extension of time is necessary to allow consideration of this paper, such an extension is hereby petitioned under 37 C.F.R. §1.136(a). Any additional fees believed to be due in connection with this paper are hereby authorized to be charged to our Deposit Account No. 50-0220.

Respectfully submitted,


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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on February 12, 2004.


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